

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

DISTRICT OF NH
FILED
 2020 JUN 15 P 7:49

Sensa Verogna, Plaintiff,

v.

Twitter Inc., Defendant.

Case #: **1:20-cv-00536-SM**
 24 HOUR DEPOSITORY

**PLAINTIFF'S MOTION AND MEMORANDUM TO STRIKE DEFENDANT'S
 MOTION TO DISMISS COMPLAINT OR, ALTERNATIVELY, TRANSFER**

1. Plaintiff, pro se and proceeding anonymously as, "Sensa", respectfully moves this Court to strike Twitter, Inc's. submittal "TWITTER'S" "MOTION" TO DISMISS COMPLAINT OR, ALTERNATIVELY, TRANSFER and the "MEMORANDUM" OF LAW IN SUPPORT as it violates N.H. RSA 311:7 which would be prejudicial to the plaintiff and which would be scandalous for this Court to accept and therefore would be an insufficient defense under Rule 12(f) of the Federal Rules of Civil Procedure, Title 28, United States Code, and therefore should be stricken from the record in its entirety.

2. Venue is proper as stated in the COMPLAINT at Paragraphs 8, 9 and 10. Sensa re-alleges and incorporates by reference each paragraph, tweet, article, exhibit or attachments included in this document and in the record or on the docket to date, as though set forth fully herein.

3. Attorney Julie E. Schwartz. Esq, an attorney admitted to practice in another state, but not authorized to practice in New Hampshire, who counseled the defendant Twitter Inc. on New Hampshire law and drafted legal documents for them and then submitted them to a New Hampshire Court without requesting and being granted pro hac vice status before filing the Motion and Memorandum with the Court engaged in the unauthorized and prohibited practice of law in New Hampshire as prohibited by N.H. RSA 311:7, and for this Court to accept defendant's Motion

29 and Memorandum submitted by Attorney Julie E. Schwartz. Esq would be tantamount to affixing
30 an ex post facto imprimatur of approval of the unauthorized and prohibited practice of law in
31 violation of N.H. RSA 311:7.

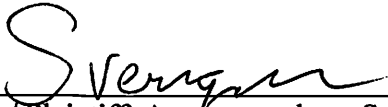
32 4. Plaintiff argues that Attorney Julie E. Schwartz. Esq's submittal of the Motion and
33 Memorandum is scandalous as it is illegal to practice law in any Court in this State unless prior
34 procedures of admission have been followed and prior to any submittal to the Court which is an
35 unauthorized practice of law and illegal in the State of New Hampshire. Plaintiff also argues that
36 if this Court does not strike Attorney Swartz's Motion and Memorandum that it would most
37 certainly "detract from the dignity of the court."

38 5. The Motion and Memorandum are illegal and prohibited and therefore non-
39 conforming and should be stricken by the Clerk or Court as authorized under Local Rules 5.2 or
40 Rule 77.2 and under Rule 12(f) and thus if there is no Motion and Memorandum, Twitter, Inc. is
41 left without a sufficient defense.

42 6. Defendant has been contacted and does not assent to the relief sought through this
43 Motion.

44 7. For the reasons stated herein, and in the supporting brief and memorandum of law,
45 this Court must declare Twitters "MOTION" TO DISMISS COMPLAINT OR,
46 ALTERNATIVELY, TRANSFER and the "MEMORANDUM" OF LAW IN SUPPORT to be
47 prejudicial to the plaintiff and in violation of N.H. RSA 311:7, therefore scandalous and therefore
48 an insufficient defense under Fed.R.Civ.P. 12(f) and therefore, must be stricken from the record in
49 its entirety.

Respectfully,



/s/ Plaintiff, Anonymously as Sensa Verogna
SensaVerogna@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June 2020, the foregoing document was made upon the Defendant, through its attorneys of record to Jonathan M. Eck jeck@orr-reno.com and Julie E. Schwartz, Esq., JSchwartz@perkinscoie.com.